

LAW OFFICE OF  
ZACHARY MARGULIS-OHNUMA

May 13, 2020

Via ECF

Hon P. Kevin Castel  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application granted.  
SO ORDERED.  
Dated: 5/13/2020



P. Kevin Castel  
United States District Judge

RE: U.S. v. Donato Poliseno, 20 Cr. 163 (PKC)

Dear Judge Castel:

This office represents Donato Poliseno in the above-captioned matter. [I write to request a modification of Mr. Poliseno's conditions of release to permit him to travel to Philadelphia every Thursday for work.] The government does not object to this request. Pretrial Services has been contacted regarding this request, but I have yet to receive a response.

Mr. Poliseno owns a business that sells fruit baskets and flower arrangements. Each Thursday, he travels by car from his home at approximately 5am to a wholesale market in Philadelphia to purchase the produce he needs for his business. Typically, he is home by 1pm.

Therefore, I respectfully request that Mr. Poliseno's release conditions be modified to permit him to travel to Philadelphia each Thursday for the purpose of obtaining the items he needs for his profession.

Thank you for your attention to this case.

Very truly yours,



Victoria Nicole Medley

CC: Sarah Mortazavi and Andrew Adams (via ECF)  
PTO Angie Ramirez (via email)